



ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

**MR DOCKET 02-290, DA 02-2320
KM-10527**

**3 Point Media-Franklin, LLC
Sanpete County Broadcasting Company
Millcreek Broadcasting, LLC
M. Kent Frandsen
Frandsen Media Company, LLC
Sun Valley Radio, Inc.**

Prepared by:

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November, 2002

Engineering Statement
In Support of a
Counterproposal
MN Docket 02-290, RM-10527

3 Point-Sanpete-Frandsen

General

We have been retained by 3 Point Media-Franklin, LLC; Sanpete County Broadcasting Company; Millcreek Broadcasting, LLC; M. Kent Frandsen; Frandsen Media Company, LLC; and Sun Valley Radio, Inc. (herein referred to as "3 Point-Sanpete-Frandsen") to prepare the engineering portion of a counterproposal to MB Docket 02-290 (RM-10527). The original petition for rule making seeks to allot channel 249A to Manila, Utah as that community's first commercial FM radio service. 3 Point-Sanpete-Frandsen in the instant counterproposal seeks to file a counterproposal to this petition for rule making. The instant counterproposal will provide a first local service to Elsinore, Utah, as well as eliminate white area to nearly 1,000 Utah residents.

Exhibits Explained

Channel 248C, Coalville, Utah

Exhibit E, Figure 1 is an allocation study showing the spacings to other stations if channel 248C is reallocated from Franklin, Idaho to Coalville, Utah as that community's second local aural service. The only short spacings shown are to KLGL, channel 248C in Richfield, Utah; a vacant allotment for channel 24761 at Dinosaur, CO; and the proposed allotment of channel 249A at Manila, Utah. This is the **MX** point with **the** PRM.

Exhibit E, Figure 2 shows the proposed city-grade contour for channel 248C from the proposed site. The city-grade contour easily covers 100% of Coalville, Utah. Exhibit E,

Figure 3 is a gain/loss study that demonstrates the proposed areas that channel 2486 will cover and will no longer cover as a result of the proposed relocation.

Channel 249C, Elsinore, Utah

In order to allocate channel 248C at Coalville, the short spacing with channel 248C (KLGL) in Richfield, Utah must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 248C at Richfield and allocate channel 249C at Elsinore, Utah as that community's first local aural service. Exhibit E, Figure 4 is an allocation study showing the proposed short spacing to only one other facility. Exhibit E, Figure 5 is a 70 dBu contour map showing coverage of Elsinore with a city-grade signal. Exhibit E, Figure 6 shows the area gained and lost by the proposed modification to KLGL. Exhibit E, Figure 7 shows that the proposed modification will not create any gray or white area issues. However, Exhibit E, Figure 8 shows that the proposed allotment of channel 249C at Elsinore eliminates white area to 976 persons (all in Utah) and 1,597 square kilometers.

Channel 228A, Manila, Utah

In MB Docket 02-290, Rural Pima Broadcasting asked that channel 249A be allocated to Manila, Utah as that community's first service. The instant counterproposal precludes that allocation. However, channel 228A can be substituted for channel 249A at Manila at the community's reference coordinates. This is demonstrated in Exhibit E, Figure 9.

Channel 259A, Beaver, Utah

In order to allocate channel 249C at Elsinore, Utah, the proposed short spacing with the vacant allotment at Beaver, Utah must be eliminated. 3 Point-Sanpete-Frandsen propose

to substitute channel 259A at Beaver for channel 246A with no site change needed. (See Exhibit E, Figure 10.)

Channel 255C3, Franklin, Idaho

Even though channel 248C at Franklin is currently an unbuilt CP, 3 Point-Sanpete-Frandsen wish to maintain the first local service at Franklin by deleting channel 256C1 at Fort Bridger, WY (KNYN) and allocating it at Franklin on channel 255C3. This is shown in Exhibit E, Figure 11. Exhibit E, Figures 12 and 13 demonstrate the community coverage and the gain/loss figures, respectively. Exhibit E, Figure 14 shows that no gray or white area will be created as a result of this spectrum modification.

Channel 280C, Fort Bridger, Wyoming

The deletion of channel 256C1 at Fort Bridger would leave that community without local service. As such, the instant counterproposal seeks to delete channel 280A at Smithfield, Utah (KGNT) and allocate channel 280C at Fort Bridger in order to replace the removal of KNYN. Exhibit E, Figure 15 shows the allotment of channel 280C at Fort Bridger is short spaced only to KMDG, channel 280C at Nephi, Utah; and the vacant allotment for channel 279C1 at Rangely, Colorado. (Since the community's reference coordinates are used for channel 280C at Fort Bridger, no 70 dBu map is included.) Exhibit E, Figure 16 is a gain/loss study map, and Exhibit E, Figure 17 shows that all points inside the loss area will continue to receive at least 5 aural services.

Channel 244C1, Smithfield, Utah

When channel 280A is deleted at Smithfield, that community is without local service. Therefore, 3 Point-Sanpete-Frandsen propose to delete channel 244C1 at Preston, Idaho (KKEX) and allocate channel 244C1 at Smithfield with no site modification. (Preston

will continue to be served by KACH(AM), 1340 kHz.) Exhibit E, Figure 18 shows that KKEX's current site is fully spaced, and Exhibit E, Figure 19 shows that it will be able to city-grade Smithfield.

Channel 256C, Nephi, Utah

The allocation of channel 280C at Fort Bridger is short spaced to channel 280C (KMDG) at Nephi, Utah. 3 Point-Sanpete-Frandsen propose to substitute channel 256C for channel 280C at Nephi with no site change needed. This substitution is short spaced only to the vacant allotment of channel 257C2 at Monroe, Utah. (See Exhibit E, Figure 20.)

Channel 264C2, Monroe, Utah

In order to substitute channel 256C at Nephi, Utah, the short spacing with channel 257C2 at Monroe, Utah must be eliminated. Channel 264C2 can be used in lieu of channel 257C2 at Monroe with no change in reference coordinates (see Exhibit E, Figure 21).

Channel 295C1, Rangely, Colorado

The vacant allotment of channel 279C1 at Rangely, Colorado is short spaced to the proposed allocation of channel 280C at Fort Bridger by 17.93 kilometers. To eliminate this, channel 295C1 is proposed as a substitute for channel 279C1 at Rangely with no site change. This substitution is short spaced to no other facilities, as Exhibit E, Figure 22 demonstrates.

Channel 266C1, Dinosaur, Colorado

Channel 237C1 at Dinosaur is short spaced to the proposed allotment of channel 248C at Coalville, Utah. In order to eliminate this short spacing, channel 266C1 can be substituted at Dinosaur with no site change. This is demonstrated in Exhibit E, Figure 23.

This substitution is short spaced only to the vacant allotment of channel 266A at Wamsutter, Wyoming.

Channel 234A, Wamsutter, Wyoming

In order to substitute channel 266C I for channel 247C1 at Dinosaur, 3 Point-Sanpete-Frandsen propose to substitute channel 234A for channel 266A with site modification (see Exhibit E, Figure 24).

Conclusion

The allocation of channel 249C at Elsinore, Utah in the instant counterproposal will eliminate white area to nearly 1,000 persons. Under priority (1), this gives the 3 Point-Sanpete-Frandsen counterproposal precedent over the PRM at Manila.

Statement of the Consultants

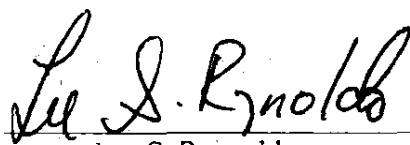
The instant engineering **statement** was **prepared** for 3 Point Media-Franklin, LLC; Sanpete County Broadcasting Company; Millcreek Broadcasting, LLC; M. Kent Frandsen; Frandsen Media Company, LLC; and Sun Valley Radio, Inc. ("3 Point-Sanpete-Frandsen") and supports a counterproposal to MB Docket **02-290**. It was developed by Reynolds Technical Associates ("RTA") and may not be used for purposes other than submission to the Commission by RTA.

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It is prepared for 3 Point-Sanpete-Frandsen under contractual agreement, and its certification by RTA is used accordingly. If 3 Point-Sanpete-Frandsen fails in its contractual obligation, RTA reserves the right to withdraw its certification.

The information in this application is compiled from the most **recent** Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes

For RTA:



Lee S. Reynolds

November 18th, 2002

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ENGINEERING STATEMENT

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Counterproposal
MM Docket 02-290

3 Point-Sanpete-Frandsen

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Franklin, ID Coalville, UT	248C -----	255C3	Delete channel 248C at Franklin, UT and change community of CP to Coalville, UT on Ch 248C. This is the MX point with the instant NPRM (See Ch 248C CP sub changes listed below & replacement service - KNYN KNYN also has sub changes)
	229C 248C -----		Delete channel 248C at Richfield, UT and change community of license to Elsinore UT on Ch 249C See narrative for discussion of white area. (See KLGC sub change listed below)
	246A	259A	Delete channel 246A at Beaver, UT and substitute 259A at site
	256C1 248C 280A 244C1 (KACH AM)	280C 255C3 244C1 MCH - AM	Delete Ch 256C1 (KNYN) at Ft. Bridger, ID and substitute Ch 255C3 as a replacement Service at Franklin, ID and modify the license of KNYN accordingly. Delete Ch 280A at Smithfield, UT and allocate to Ft. Bridger, WY as a replacement service (KGNT) and modify the license accordingly. Delete Ch 244C1 at Preslon, ID and allocate 244C1 at Smithfield, UT as a replacement Service. Modify the license of KKEX accordingly. No site change required.
Nephi, UT	280C	256C	Delete Ch 280C and substitute Ch 256C at Site (KMDG). (sub change for ch 256C at Nephi shown below)
Monroe, UT	257C2	264C2	Delete Ch 257C2 and substitute Ch 264C2 at site (no sub changes required)

Continued on the next page

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Dinosaur, CO	247C1	266C1	Delete Ch 279C1 and substitute Ch 295C1 at site. (No sub changes required).
			Delete Ch 247C1 at Dinosaur, CO and substitute Ch 266C1 at site. (No sub
			Delete Ch 200A and substitute Ch 234A at Wamsutter, WY at site. (No sub changes required)

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 248C at Coalville, Utah Allocation Study

REFERENCE
40 55 46 N CLASS = C
111 00 26 W Current Spacings

DISPLAY DATES
DATA 10-29-02
SEARCH 11-07-02

----- Channel 248 - 97.5 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
------	---------	----------	------	-----	-----	--------

Community of Coalville UT 32.99 267.9
Reference Coordinates:
North Latitude: 40-55-04
West Longitude: 111-23-55

970814 CP 248C1 Franklin ID 136.73 312.2 270.0 -133.27
Of no concern:
Construction permit for Franklin, Idaho relocated to Coalville, Utah in instant counterproposal

KLGL LIC 248C Richfield UT 189.94 200.3 290.0 -100.06
KLGL.C CP 248C Richfield UT 190.01 200.2 290.0 -99.99
Of concern:
Channel 248C at Richfield and Channel 249C allocated at Elsinore, Utah. Richfield will be served by KCYQ.

RADD ADD 249A Manila UT 108.40 86.1 165.0 -56.60
Of concern:
MX point with the PRM for channel 249A at Manila, Utah.

ALLO VAC 247C1 Dinosaur CO 185.51 113.6 209.0 -23.49
Of concern:
Channel 266C1 substituted for channel 247C1 at Dinosaur, CO

KISNFM LIC 246C Salt Lake City UT 105.14 253.8 105.0 0.14
KBZN LIC 250C Ogden UT 105.14 253.8 105.0 0.14
KISNFM CP 246C Salt Lake City UT 105.15 253.8 105.0 0.15
KDLY LIC 248C1 Lander WY 280.88 40.7 270.0 10.88

**AD248C, Coalville, UT
City-Grade Contour Map**

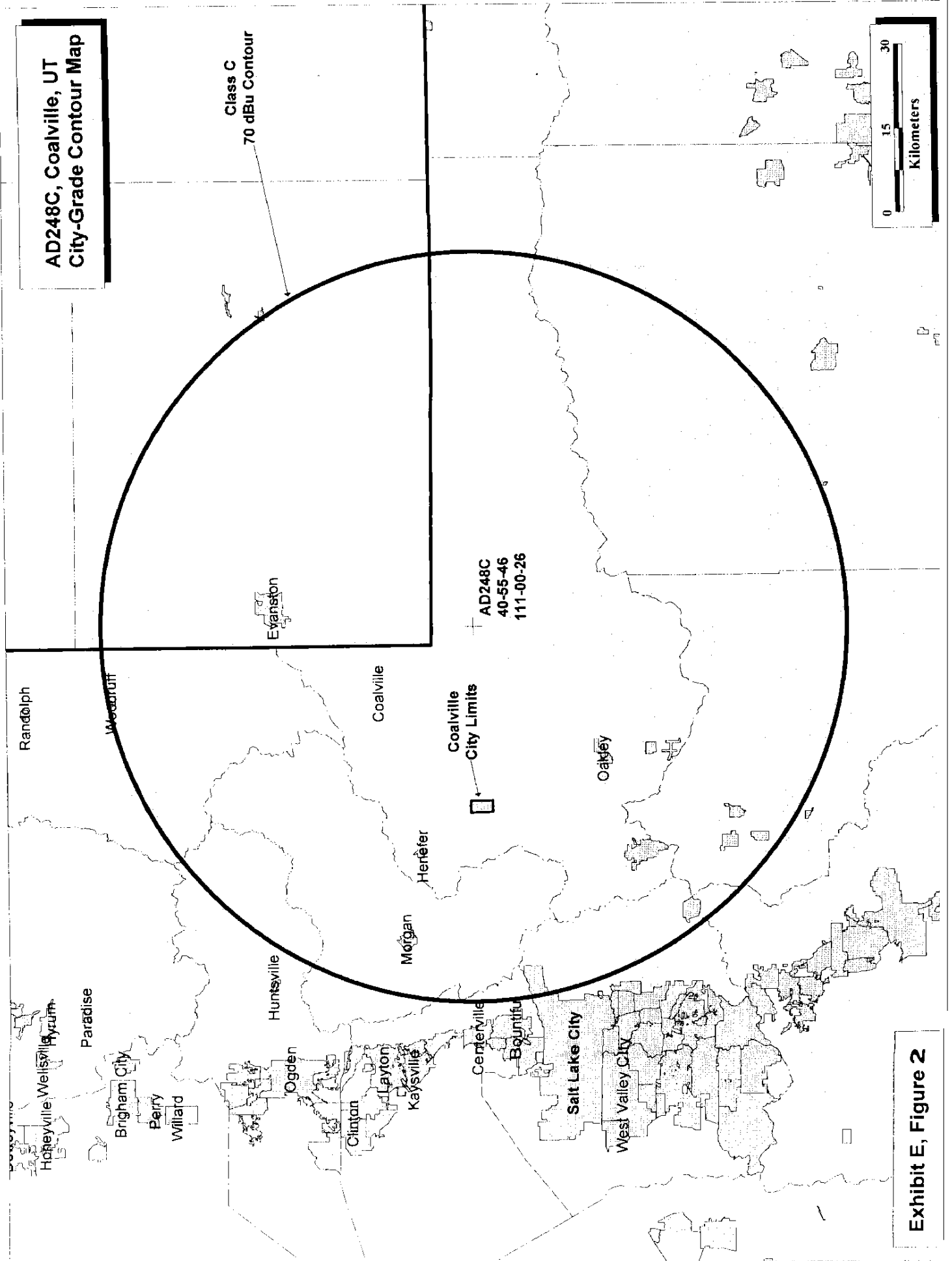


Exhibit E, Figure 2

Gain Area = 22,510 sq km
Loss Area = 22,510 sq km
Pop. Gain = 1,746,821
Pop. Loss = 198,669

AD248C, Coalville, UT
Gain/Loss Study Map

LOSS AREA

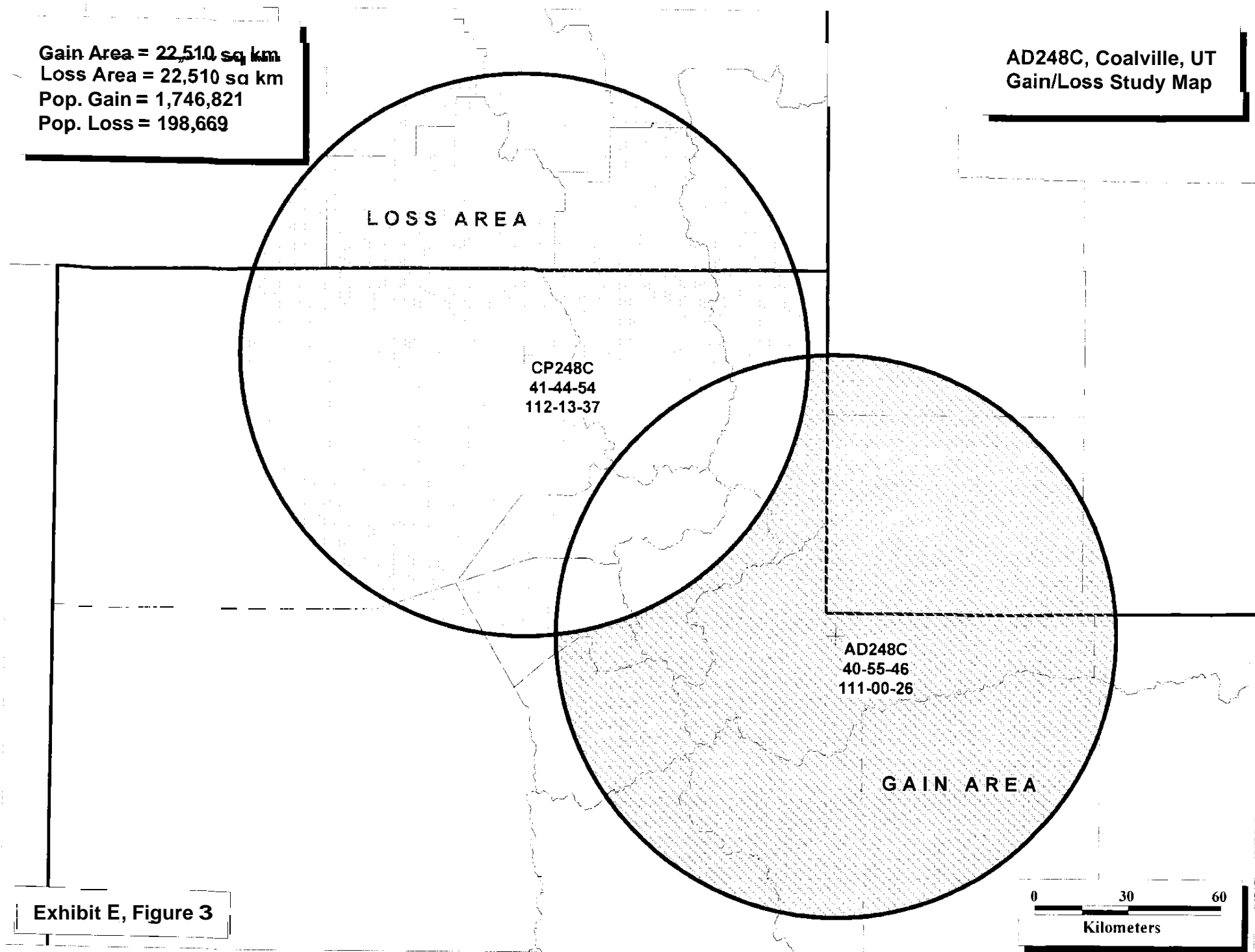
CP248C
41-44-54
112-13-37

AD248C
40-55-46
111-00-26

GAIN AREA

Exhibit E, Figure 3

0 30 60
Kilometers



Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 249C at Elsinore, Utah Allocation Study

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REFERENCE                                     DISPLAY DATES
38 16 23 N                                     DATA 10-29-02
112 09 13 W                                     SEARCH 11-08-02
                                     CLASS = C
                                     Current Spacings
----- Channel 249 - 97.7 MHz -----
Call      Channel      Location      Dist      Azi      FCC      Margin
-----
Coordinates of Elsinore      UT      45.45      0.7
Reference Coordinates:
North Latitude: 38-40-57
West Longitude: 112-08-50

KLGL.C CP 248C Richfield      UT      121.06      15.8      241.0      -119.94
KLGL LIC 248C Richfield      UT      121.16      15.7      241.0      -119.84
Of no concern:
Licensed and CP coordinates for instant facility (KLGL)

RADD ADD 246A Beaver      UT      42.59      270.7      95.0      -52.41
Of concern:
Channel 25911 proposed as substitution in instant
counterproposal

KREC LJC 251C Brian Head      UT      114.23      224.9      105.0      9.23
ALLO VAC 250C1 Tubs City      AZ      228.85      158.3      209.0      19.65
KBZN LIC 250C Ogden      UT      265.01      359.1      241.0      24.01
KVES LIC 248C Mesquite      NV      286.35      229.8      241.0      45.35
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**AD249C, Elsinore, UT
City-Grade Contour Map**

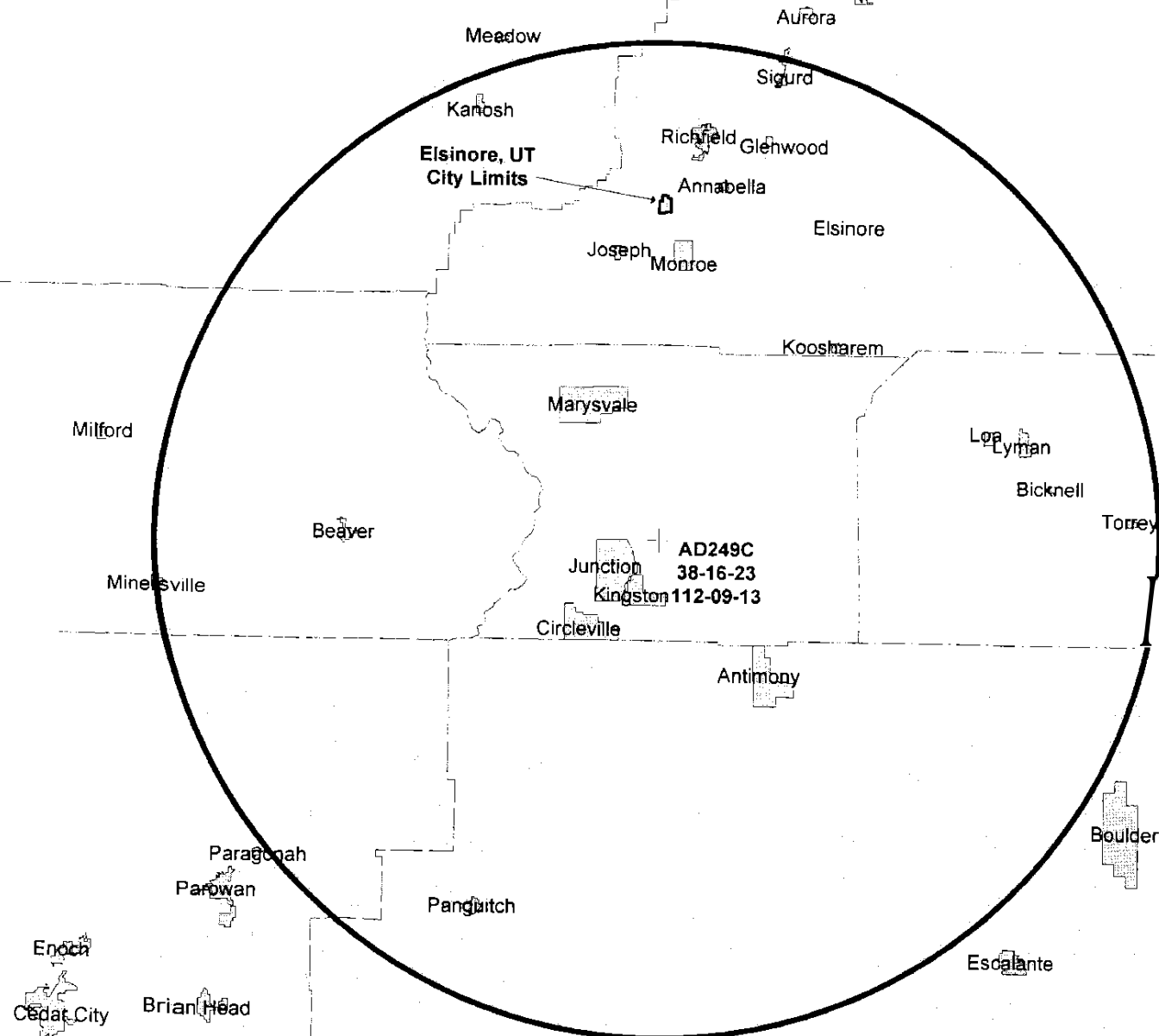


Exhibit E, Figure 5

0 15 30
Kilometers

Gain Area = 20,503 sq km
Loss Area = 20,503 sq km
Pop. Gain = 121,150
Pop. Loss = 17,984

AD249C, Elsinore, UT
Gain/Loss Study Map

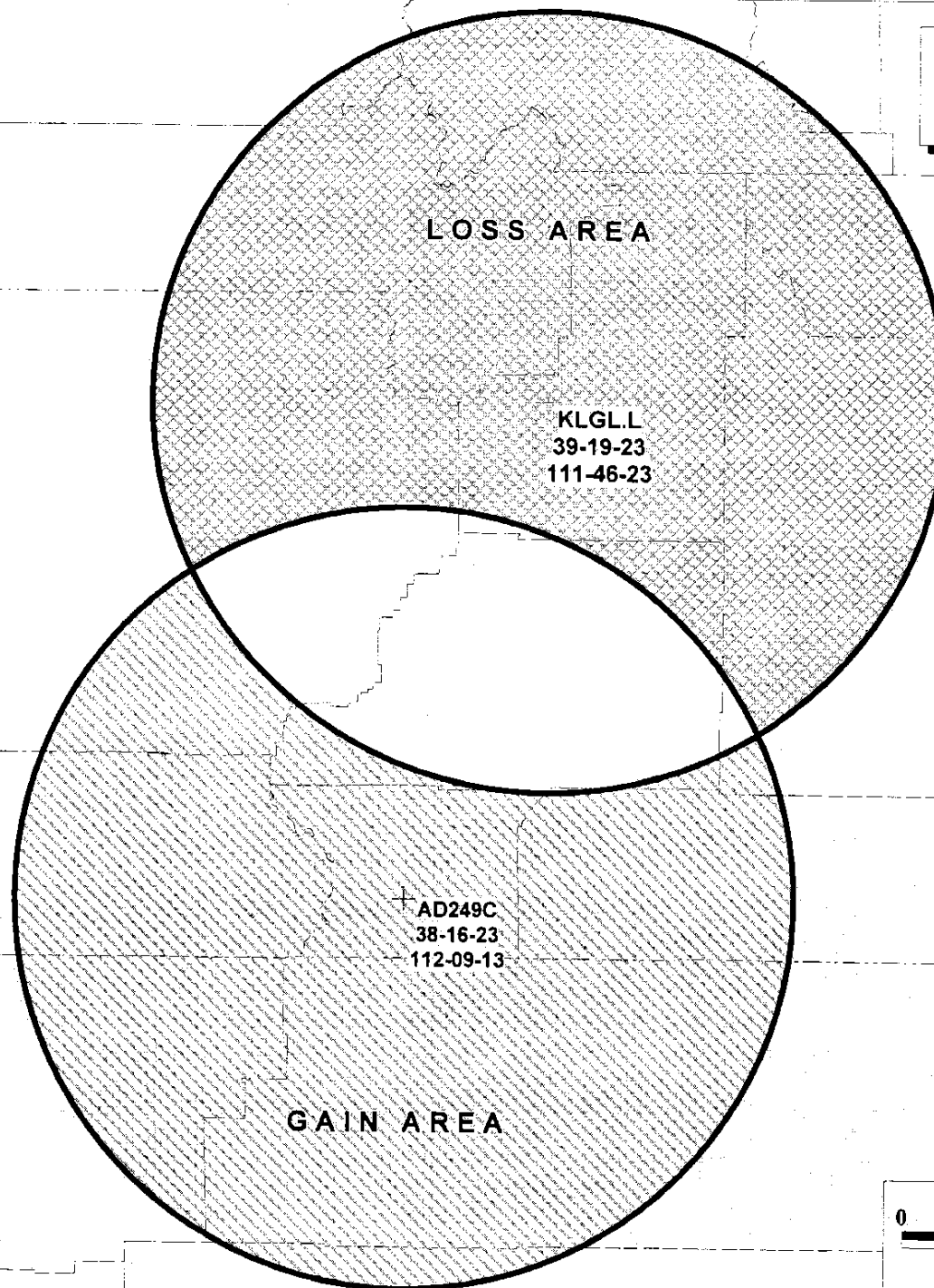


Exhibit E, Figure 6

0 40 80
Kilometers

**KLGL, Richfield, UT
Remaining Services
Study Map**

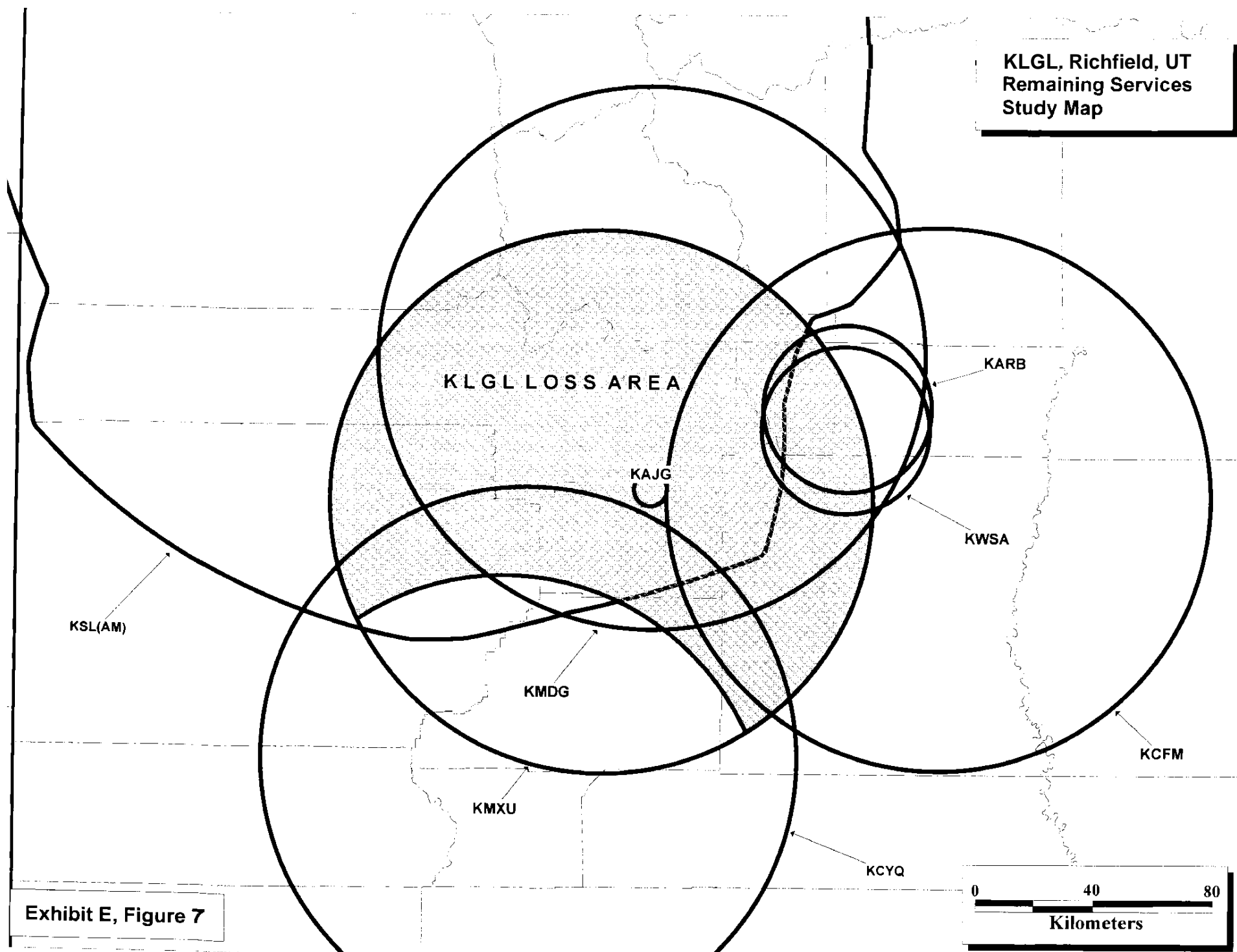
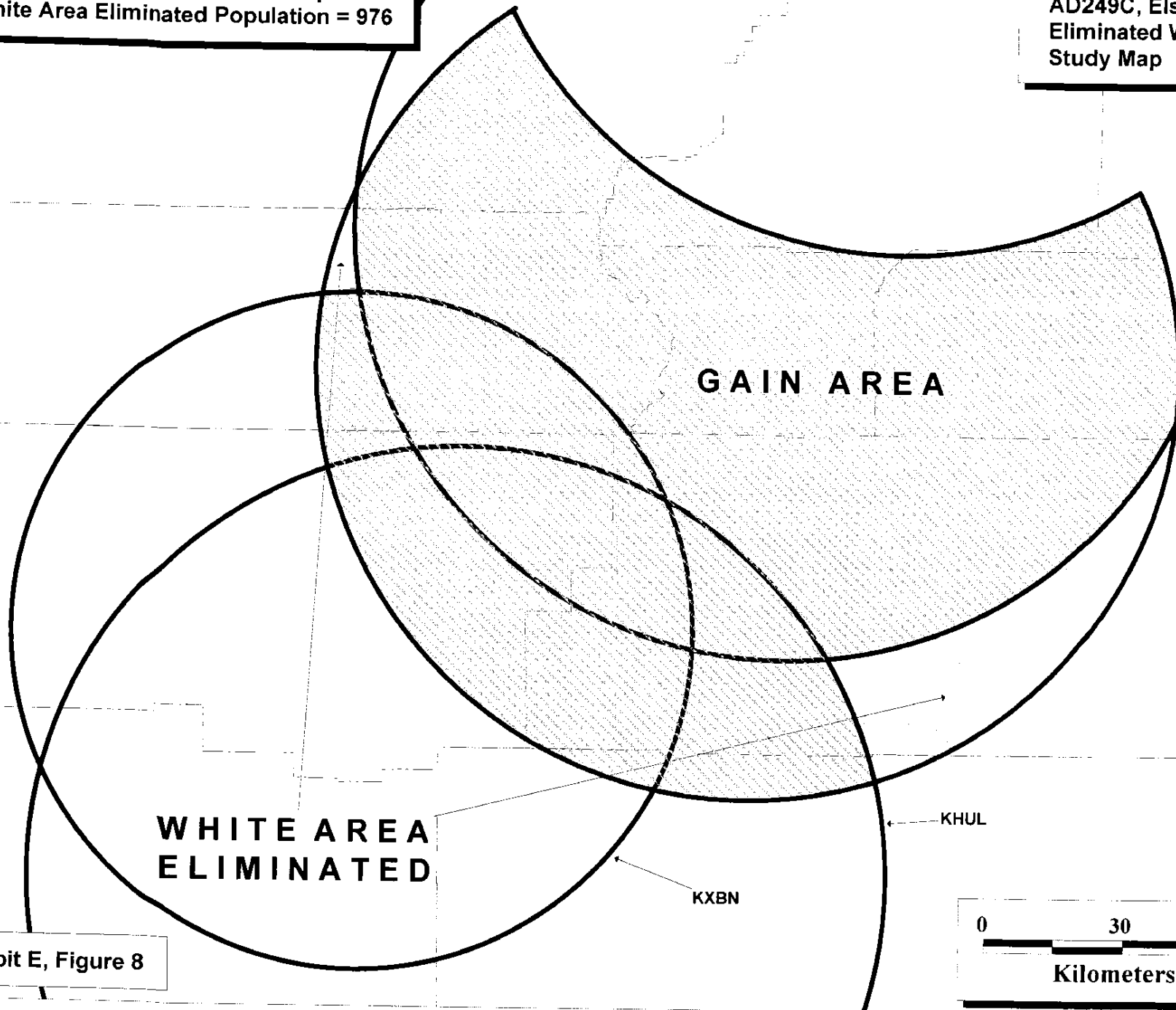


Exhibit E, Figure 7

White Area Eliminated = 1,597 sq km
White Area Eliminated Population = 976

AD249C, Elsinore, UT
Eliminated White Area
Study Map



**WHITE AREA
ELIMINATED**

GAIN AREA

KCYQ

KHUL

KXBN

0 30 60

Kilometers

Exhibit E, Figure 8

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 228A at Manila, Utah Allocation Study

(Using Proposed Channel 249A Coordinates as Reference)

REFERENCE							DISPLAY DATES
40 59 17 N			CLASS = A				DATA 10-29-02
109 43 19 W			Current Spacings				SEARCH 11-08-02
----- Channel 228 - 93.5 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	

KUBLFM LIC 227C	Salt Lake City	UT	212.32	260.9	165.0	47.32	
KUBLFM CP 227C	Salt Lake City	UT	212.33	260.9	165.0	47.33	

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 259A at Beaver, Utah Allocation Study (Using the vacant Channel 246A coordinates at Beaver as reference)

REFERENCE						DISPLAY DATES	
38 16 37 N			CLASS = A			DATA 10-29-02	
112 38 25 W			Current Spacings			SEARCH 11-12-02	
----- Channel 259 - 99.7 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin

ALLO	VAC 257C2	Monroe	UT	59.13	49.3	55.0	4.13
ALLO	RSV 260C	St. George	UT	175.61	205.5	165.0	10.61
KONY	LIC 260C	St. George	UT	175.61	205.5	165.0	10.61
RADD	ADD 262C	Escalante	UT	107.18	121.4	95.0	12.18

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

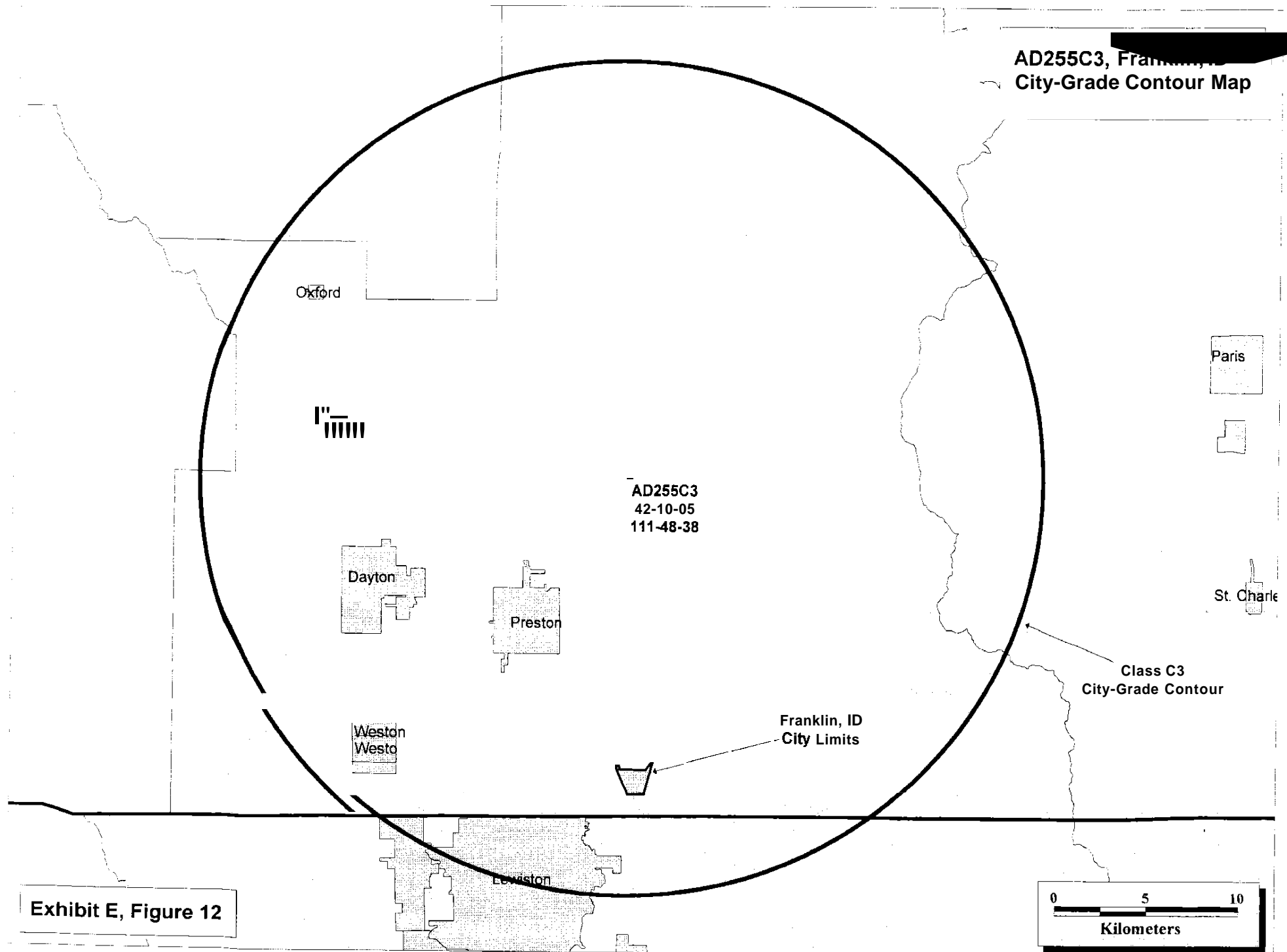
Channel 255C3 at Franklin, Idaho Allocation Study

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REFER CE                                     SE AY DATES
4% 10 05 N                                CLASS = C3      DATA 10-29-02
111 48 38 W                                Current Spacings SEARCH 11-08-02
----- Channel 255 - 98.9 MHz -----
Call      Channel      Location      Dist      Azi      FCC      Margin
Community of      Franklin      ID      17.19      178.8
Reference Coordinates:
North Latitude: 42-00-48
West Longitude: 111-48-22

KNYN      LIC 256C1      Fort Bridger      WY      117.66      140.1      144.0      -26.34
Of no concern:
Coordinates for instant facility (KNYN)

KBEEFM LIC 254C      Salt Lake City      UT      175.66      189.6      176.0      -0.34
KUPIFM LIC 256C1      Idaho Falls      ID      152.80      357.8      144.0      8.80
KRSVFM LIC 254A      Afton      WY      102.05      41.6      89.0      13.05
KLLP      LIC 253C2      Chubbuck      ID      94.47      332.5      56.0      38.47
```

AD255C3, Franklin, ID
City-Grade Contour Map



Gain Area = 4,803 sq km
Loss Area = 16,422 sq km
Pop. Gain = 32,278
Pop. Loss = 30,443

AD255C3, Franklin, ID
Gain/Loss Study Map

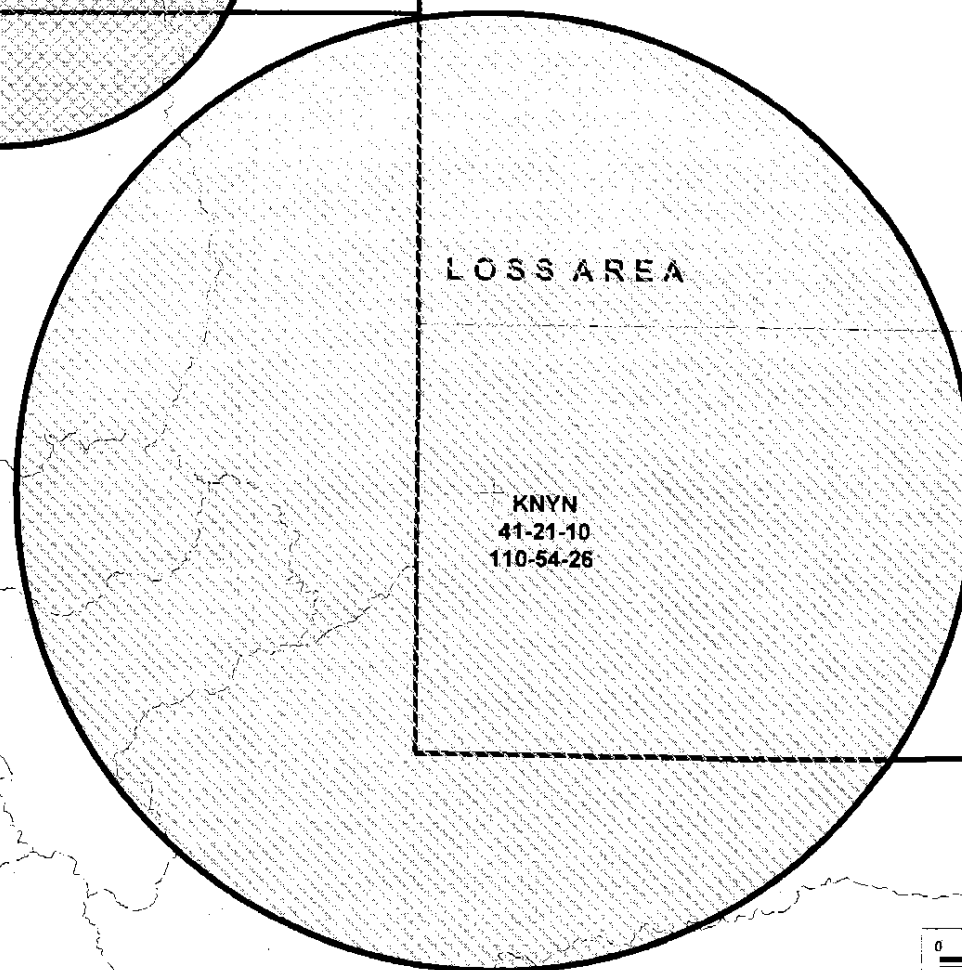
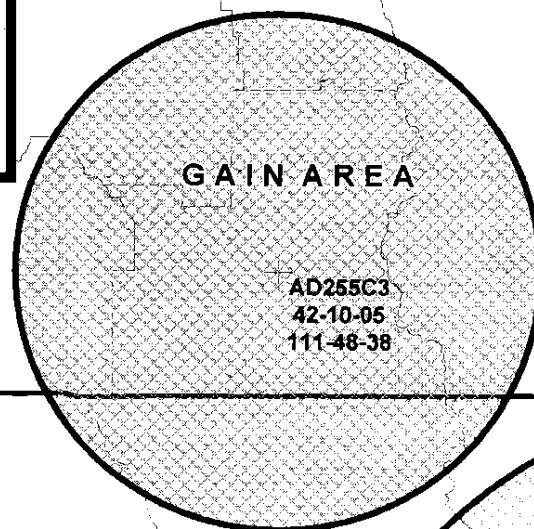


Exhibit E, Figure 13

0 15 30
Kilometers

AD255C3, Franklin, ID
Remaining Services
Study Map

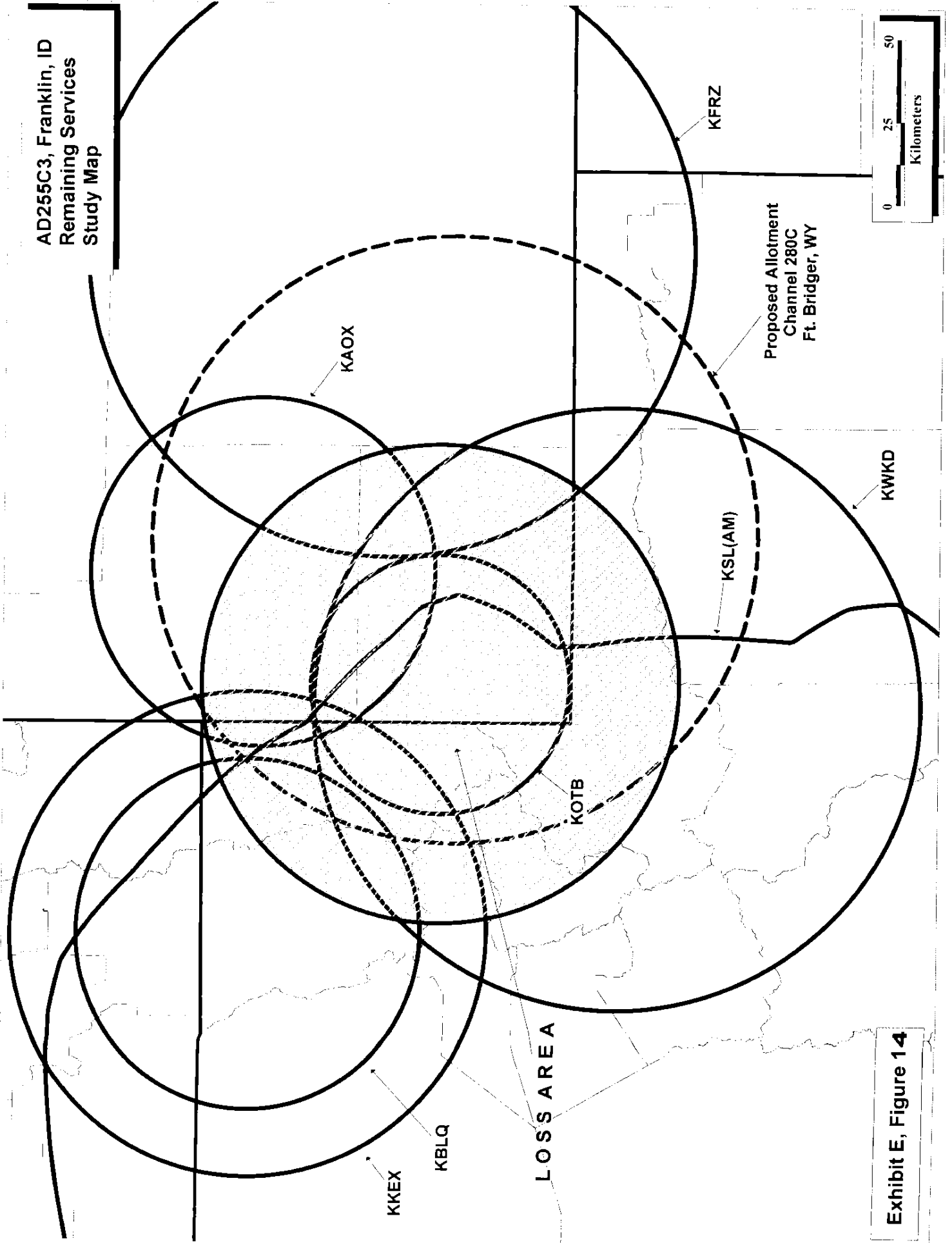


Exhibit E, Figure 14

Engineering Statement
In Support of a
Counterproposal
MM Docket 02-290
Channel 280C at Fort Bridger, WY Allocation Study
(Using Community's Coordinates as Reference)

REFERENCE		DISPLAY DATES
41 19 00 N	CLASS = C	DATA 10-29-02
110 23 01 W	Current Spacings	SEARCH 11-08-02
----- Channel 280 - 103.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin

Community of	Fort Bridger	WY	0.0	0.0		
Reference Coordinates:						
North Latitude: 41-19-00						
West Longitude: 110-23-01						
KGNT	LIC 280A	Smithfield	UT	129.73	295.1	226.0 -96.27
Of no concern:						
Licensed coordinates of instant facility (KGNT)						
KMDG	LIC 280C	Nephi	UT	200.24	210.6	290.0 -89.76
Of concern:						
Changing to channel 256C at current site in instant counterproposal						
RDEL	DEL 279C1	Rangely	CO	191.07	135.3	209.0 -17.93
ALLO	VAC 279C1	Rangely	CO	191.07	135.3	209.0 -17.93
Of concern:						
Channel 295C1 proposed in lieu of channel 279C1 at Rangely, CO						
KSIT	LIC 283C	Rock Springs	WY	106.73	82.h	105.0 1.73
KORR	LIC 281C1	American Falls	ID	746.30	315.0	209.0 37.30

Gain Area = 26,475 sq km
Loss Area = 2,516 sq km
Pop. Gain = 39,032
Pop. Loss = 94,658

AD280C, Fort Bridger, WY
Gain/Loss Study Map

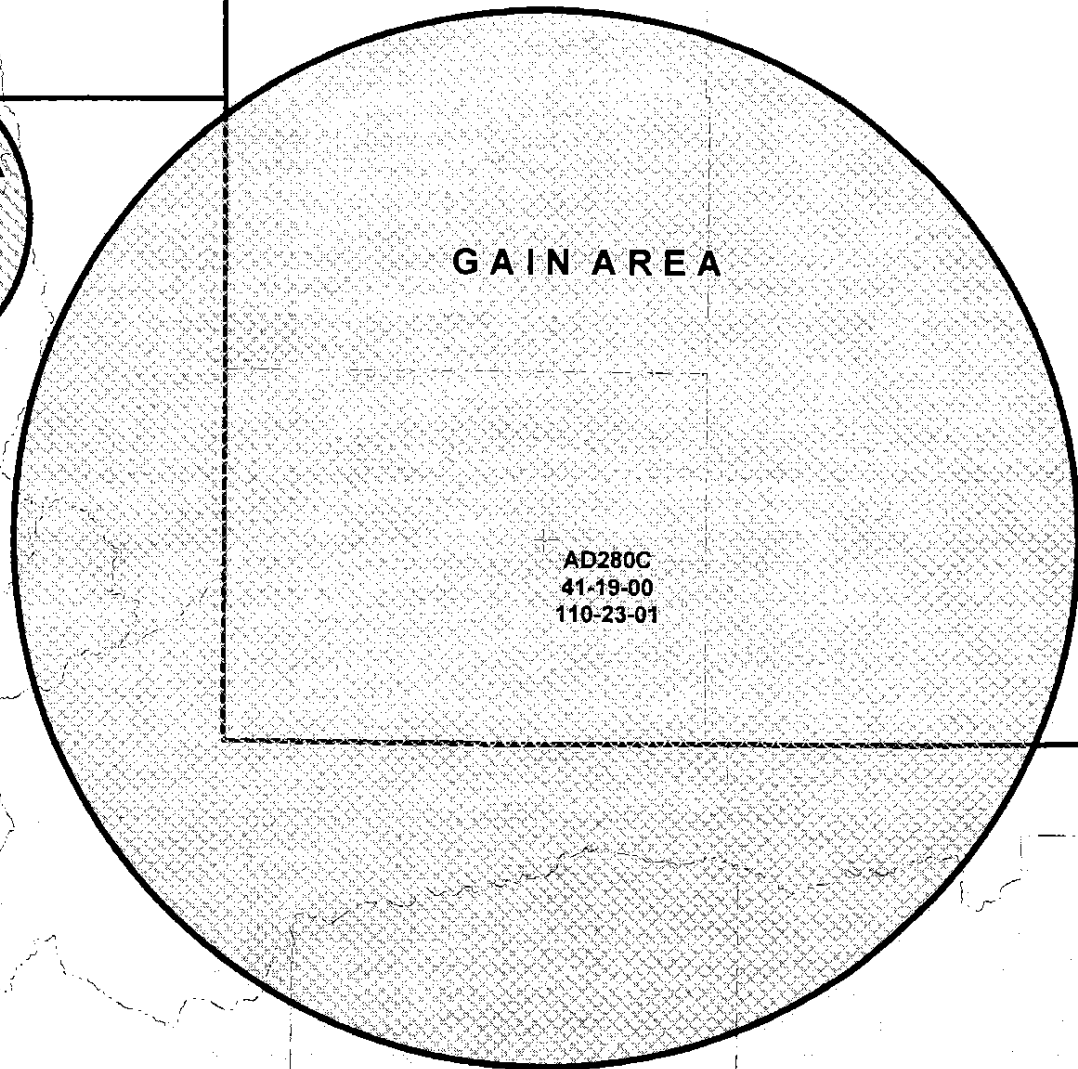
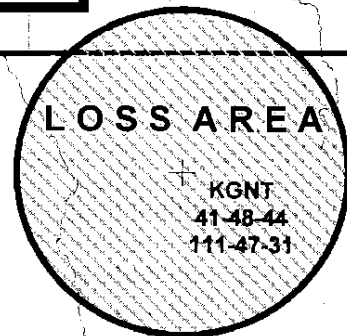
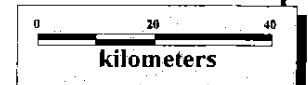


Exhibit E, Figure 16



AD280C, Fort Bridger, WY
Remaining Services Study Map

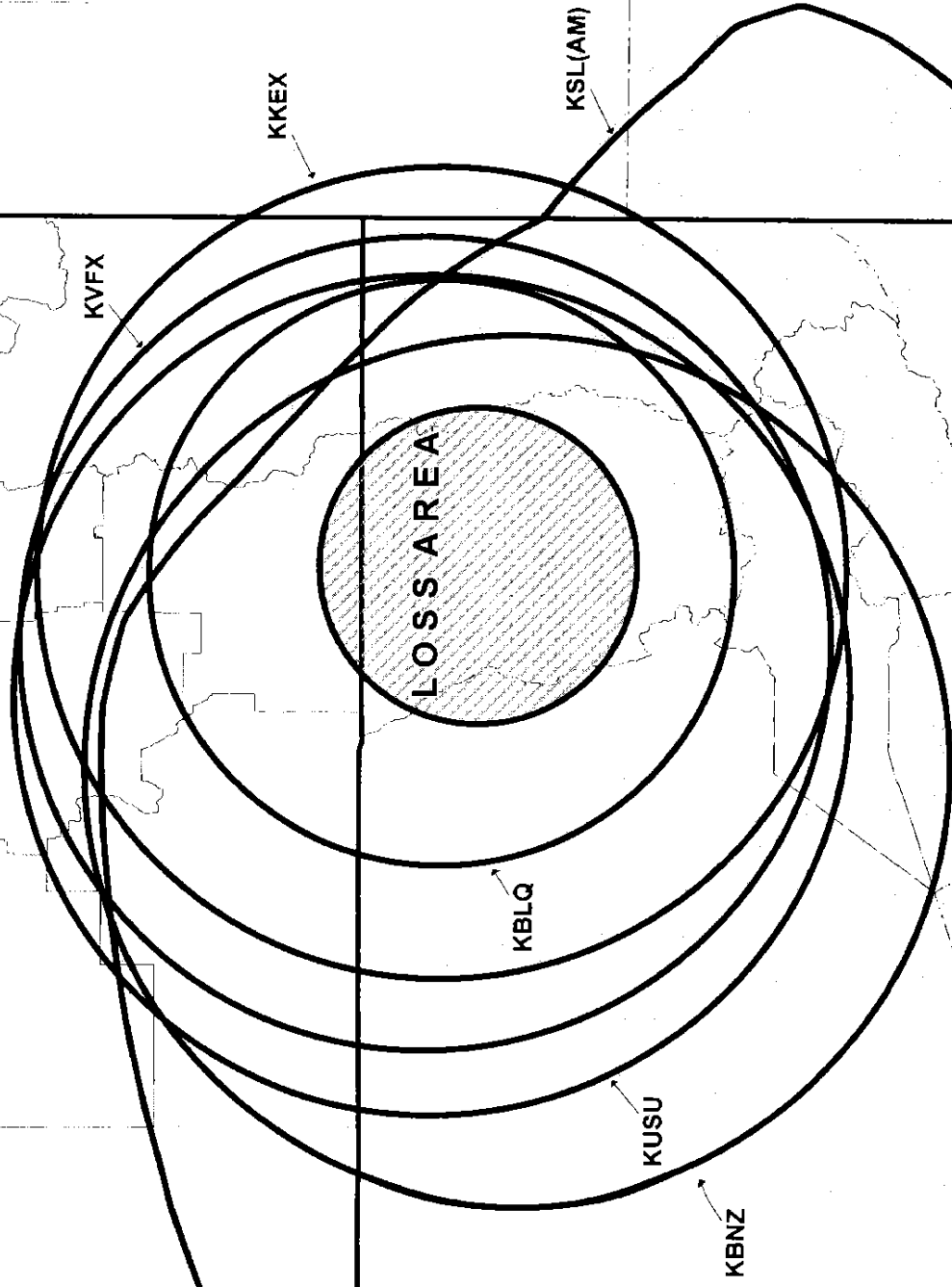


Exhibit E, Figure 17

0 20 40
kilometers

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 244C1 at Smithfield, Utah Allocation Study

(Using the Licensed KKEX Coordinates as Reference)

```
REFERENCE                                     DISPLAY DATES
41 52 18 N                                CLASS = C1          DATA 10-29-02
111 48 31 W                            Current Spacings    SEARCH 11-18-02
----- Channel 244 - 96.7 MHz -----
Call      Channel      Location      Dist      Azi      FCC      Margin
-----
Community of      Smithfield      UT      4.21      207.4
Reference Coordinates:
  North Latitude:  41-50-1/
  West Longitude: 111-49-55

KKEX LIC 244C1 Preston      ID      0.00      0.0      245.0      -245.00
Of no concern:
Licensed coordinates of KKEX

ALLO  RSV 244C1  Levan      UT      256.84      179.1      245.0      11.84
KCFM  LIC 244C  Levan      UT      283.11      173.8      270.0      13.11
KMTN  LIC 245C1 Jackson     WY      196.70      25.7       177.0      19.70
KQSW  LIC 243C  Rock Spring:: WY      129.49      101.4      209.0      20.49
KQSW  LIC 243C  Rock Springs WY      229.49      101.4      209.0      20.49
K1SNFM LIC 246C Salt Lake City UT      138.56      193.8      105.0      33.56
KXRK.C CP 242C Provo       UT      138.59      193.9      105.0      33.59
K1SNFM CP 246C Salt Lake City UT      138.59      193.8      105.0      33.59
KXRK  LIC 242C Provo       UT      143.37      191.8      105.0      38.37
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**AD244C1, Smithfield, UT
City-Grade Contour Map**

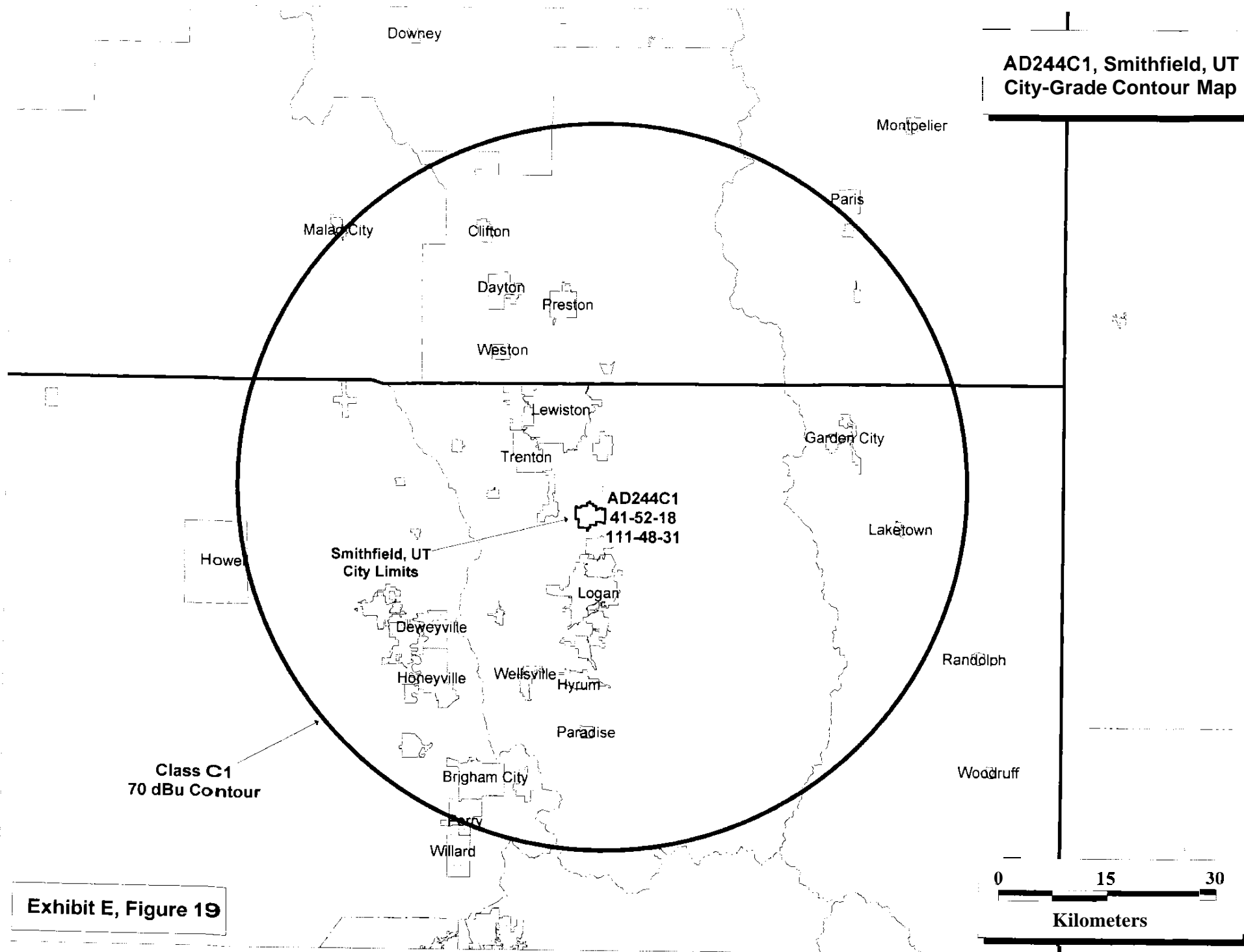


Exhibit E, Figure 19

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 256C at Nephi, Utah Allocation Study (Using KMDG's Current Site as Reference)

REFERENCE						DISPLAY DATES
39 45 37 N			CLASS = C			DATA 10-29-02
111 34 38 W			Current Spacings			SEARCH 11-11-02
----- Channel 256 - 99.1 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin

KNYN	LIC 256C1	Fort Bridger	WY	185.72	17.5	270.0 -84.28
Of no concern:						
Channel 256C1 at Fort Bridger (KNYN) deleted in instant counterproposal						
And allotted to Franklin, Idaho on channel 255C3						
ALLO	VAC 257C2	Monroe	UT	134.88	200.6	188.0 -53.12
Of concern:						
Channel 264C2 at Monroe substituted for channel 257C2 with						
No site change in instant counterproposal						
KJRR	LIC 258C	Bountiful	UT	106.38	332.5	105.0 1.38
KBEEFM	LIC 254C	Salt Lake City	UT	106.42	332.5	105.0 1.42
RADD	ADD 257C1	Rangely	CO	237.22	79.4	209.0 28.22

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 264C2 at Monroe, Utah Allocation Study (Using the Channel 257C2 at Monroe, UT Site as Reference)

REFERENCE		CLASS - C2		DISPLAY DATES			
38 37 21 N		Current	Spacings	DATA	10-29-02		
112 07 29 W		Channel 264 - 100.7 MHz		SEARCH	11-11-02		
Call	Channel	Location	Dist	Azi	FCC	Margin	
RADD	ADD 262C	Escalante	UT	105.13	154.1	105.0	0.13
KWSA.C	CP 265C2	Price	UT	164.10	51.3	130.0	34.10
KWSA	LIC 265A	Price	UT	152.71	47.4	106.0	46.71

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 295C1 at Rangely, Colorado Allocation Study (Using the city coordinates of Rangely as reference)

REFERENCE						DISPLAY DATES
40 05 15 N			CLASS = C1			DATA 10-29-02
108 48 15 W			Current Spacings			SEARCH 11-11-02
----- Channel 295 - 106.9 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin

KFVW	LJC 296C3	Aspen	CO 173.98	117.9	144.0	35.98
ALLO	VAC 296C2	Huntington	UT 203.57	246.1	158.0	45.57

Engineering Statement

In Support of a

Counterproposal

MM Docket 02-290

Channel 266C1 at Dinosaur, Colorado Allocation Study (Using the vacant Channel 247C1 coordinates at Dinosaur as reference)

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REFERENCE                                     DISPLAY DATES
40 14 37 N                                CLASS = C1      DATA  10-29-02
109 00 50 W                             Current  Spacings  SEARCH 11-11-02
----- Channel 266 - 101.1 MHz -----
Call      Channel      Location      Dist      Azi      FCC      Margin
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ALLO  VAC 266A  Wamsutter      WY      181.24      28.5      200.0      -18.76
  Of concern:
  Channel 234A at Wamsutter proposed as substitution
  In instant counterproposal

KW8A.C CP 265C2 Price      UT      159.27      240.8      158.0      1.27
KBER  LIC 266C  Ogden      IJT      274.32      280.8      270.0      4.32
HVAC  VAC 265C3 Reliance    WY      159.05      354.5      144.0      15.05
KWSA  LIC 265A  Price      UT      172.51      243.8      133.C      39.51
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